

1 JOHN C. KIRKE, #175055
2 jkirke@donahue.com
3 ANDREW S. MACKAY, #197074
4 amackay@donahue.com
5 DONAHUE FITZGERALD LLP
6 Attorneys at Law
7 1999 Harrison Street, 26th Floor
8 Oakland, California 94612-3520
9 Telephone: (510) 451-3300
10 Facsimile: (510) 451-1527

11 Attorneys for Plaintiff
12 8 VINI INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 VINI INC., a California corporation,
Plaintiff,
v.
DSV AIR & SEA INC., a New Jersey
corporation,
Defendant.

Case No. 3:20-cv-09309-JCS

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: September 10, 2021
Time: 2:00 p.m.
Crtrm.: F, 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102
Judge: Honorable Joseph C. Spero

1 Pursuant to the Court's Order Continuing Further Case Management Conference (ECF No.
 2 24, May 24, 2021) Defendant DSV Air & Sea, Inc. ("Defendant") and Plaintiff 8 Vini, Inc.
 3 ("Plaintiff") hereby submit the following Further Joint Case Management Conference Statement
 4 and Stipulation to Continue:

5 **Further Joint Case Management Statement**

6 Most of the information set forth in the parties' initial Joint Case Management Conference
 7 Statement (ECF No. 19) and prior Further Joint Case Management Conference Statement (ECF
 8 No. 23) remains the same. The parties offer supplemental information and updates corresponding
 9 to the following numbered paragraphs in that Statement and the Court's Standing Order regarding
 10 the contents of such statements (ECF No. 6-2):

11 8. Discovery: On March 3, 2021, Plaintiff propounded a first round of interrogatories
 12 and requests for production of documents. After obtaining several extensions, Defendant on June
 13 2 served partial responses without producing any documents but has promised to supplement and
 14 is assembling documents to produce by July 2, 2021.

15 12. Settlement and ADR: Plaintiff made a settlement offer in January 2021 but has yet
 16 to receive a response. Plaintiff has given Defendant a significant amount of information to review.
 17 A substantial liability analysis has been prepared to assist Defendant in evaluating its potential
 18 liability to Plaintiff and inform its settlement position. Defendant has experienced a significant
 19 delay in making that evaluation due to personnel issues. Although counsel hope to actively engage
 20 in settlement discussions and are hopeful they may be able to resolve the matter informally, Plaintiff
 21 has become skeptical and intends to proceed with depositions.

22 Dated: September 7, 2021

DONAHUE FITZGERALD LLP

24 By: /s/ John C. Kirke

25 John C. Kirke
 26 Attorney for Plaintiff
 27 8 VINI, INC.
 28

1 Dated: September 7, 2021

2 COX, WOOTTON, LERNER, GRIFFIN & HANSEN,
3 LLP

4 By: /s/ Arthur A. Severance

5 Arthur A. Severance
6 Attorney for Defendant
7 DSV AIR & SEA, INC.